

GENERAL DYNAMICS
Ordnance and Tactical Systems
Munition Services

Herstowski
RCAP-RECEIVED

OCT 04 2010

September 29, 2010

MDNR, Director of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

RE: Notice of Spill Involving Hazardous Waste
EPA ID # MOD985798164

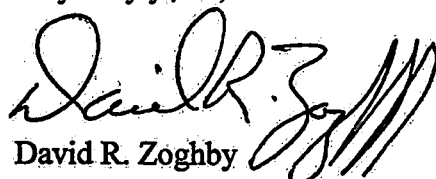
Please be advised that EBV Explosives Environmental Company dba General Dynamics Ordnance and Tactical Systems Munition Services had a spill involving APCS Ash from Building #3. The spill was found at about 4 pm on September 28, 2010. Mike Hoffman, Director of Manufacturing, made his weekly perimeter inspection by driving around the property line and found a spill of APC Ash from Building #3 on Expert Management Inc. property. There appeared to be about 10 to 15 lbs of the white powder on the ground that came from the storm water pipe. The same material was found in the rip rap below the storm water pipe on the EBV property. The ph of the material was checked and we determined that it ranged from 8 to 10. After investigation, we have found that the ash was spilled on the west side of the Building #3 pad that does not drain into the sump on the evening of September 23rd and was washed into the storm water drain during the heavy early morning rain of September 24th.

EBV notified EMI of the spill and then brought in a contractor to remove the rip rap and ash on the EBV property as well as the material and soil on the EMI property. This material and soil and rip rap was put in a hazardous waste roll-off for disposal, the same as the Building #3 APCS Ash. Samples were taken of the material, the soil under where the material and soil was removed as well as the clean soil as a background sample. These samples will be analyzed for lead, cadmium and ammonium perchlorate. The Building #3 APCS Ash typically has between 3 and 8 mg/l lead TCLP and between 0.4 and 1.2 mg/l cadmium TCLP.

EBV will be developing a plan to reduce the potential for this to occur again and will submit this plan and sample results in the near future.

Please contact myself or Robert Guy if there are questions or additional information required.

Very truly yours,



David R. Zoghby
Senior Director of Marketing

cc: EPA Region 7

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